

BRYAN SCHRODER
United States Attorney

STEPHAN A. COLLINS
Assistant U.S. Attorney
Federal Building & U.S. Courthouse
222 West Seventh Avenue, #9, Room 253
Anchorage, Alaska 99513-7567
Phone: (907) 271-5071
Fax: (907) 271-1500
Email: stephan.collins@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

| | |
|-----------------------------|---------------------------------------|
| UNITED STATES OF AMERICA, |) No. 3:20-CR-00017-SLG-MMS |
| |) |
| Plaintiff, |) <u>COUNTS 1,4:</u> |
| |) FELON IN POSSESSION OF |
| vs. |) FIREARMS AND AMMUNITION |
| |) Vio. of 18 U.S.C. §§ 922(g)(1), |
| CHRISTOPHER POINDEXTER, and |) 924(a)(2) |
| ROXANNE REED, |) |
| |) <u>COUNTS 2-3, 5-14:</u> |
| Defendants. |) DISTRIBUTION OF A |
| |) CONTROLLED SUBSTANCES |
| |) Vio. of 21 U.S.C. § 841(a)(1), |
| |) (b)(1)(A) & (B) |
| |) |
| |) <u>COUNT 15</u> |
| |) CARRYING A FIREARM DURING |
| |) DRUG TRAFFICKING CRIME |
| |) Vio. of 18 U.S.C. § 924(c)(1)(A)(i) |
| |) |
| |) <u>CRIMINAL FORFEITURE</u> |
| |) <u>ALLEGATION 1:</u> |
| |) 21 U.S.C. § 853 |

) CRIMINAL FORFEITURE
) ALLEGATION 2:
) 18 U.S.C. § 924(d)
)

INDICTMENT

The Grand Jury charges that:

COUNT 1

On or about July 23, 2018, within the District of Alaska, the defendant, ROXANNE REED, knowingly having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, firearms and ammunition, to wit:

1. Spanish Mauser, 7 x 57mm rifle bolt action;
2. Marlin, model 795, .22 caliber semi-automatic rifle; and
3. 279 rounds of assorted ammunition.

Prior Convictions

| <u>Conviction Date</u> | <u>Offense</u> | <u>Court</u> | <u>Case No.</u> |
|------------------------|--|-----------------|-----------------|
| November 13, 2004 | Assault in the Third Degree | State of Alaska | 2KB-04-65 |
| March 30, 2007 | Failure to Appear – On bail for felony offense | State of Alaska | 3AN-06-12072 |

All of which is in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

//

//

COUNT 2

On or about July 27, 2018, within the District of Alaska, the defendants, CHRISTOPHER POINDEXTER and ROXANNE REED, knowingly distributed five grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B).

COUNT 3

On or about August 13, 2018, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER, did knowingly and intentionally distribute fifty grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

COUNT 4

On or about August 14, 2018, within the District of Alaska, the defendant, ROXANNE REED, knowingly having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in an affecting interstate and foreign commerce, a Glock, Model 19X, 9mm semi-automatic pistol.

Prior Convictions

| <u>Conviction Date</u> | <u>Offense</u> | <u>Court</u> | <u>Case No.</u> |
|------------------------|--|-----------------|-----------------|
| November 13, 2004 | Assault in the Third Degree | State of Alaska | 2KB-04-65 |
| March 30, 2007 | Failure to Appear – On bail for felony offense | State of Alaska | 3AN-06-12072 |

All of which is in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

//

COUNT 5

On or about September 4, 2018, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER, did knowingly and intentionally distribute fifty grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

COUNT 6

On or about October 4, 2018, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER, did knowingly and intentionally distribute fifty grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

COUNT 7

On or about October 19, 2018, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER, did knowingly and intentionally distribute fifty grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

COUNT 8

On or about October 30, 2018, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER, did knowingly and intentionally distribute fifty grams or more of pure methamphetamine, and did aid and abet same.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

//

//

COUNT 9

On or about January 17, 2019, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER, did knowingly and intentionally distribute fifty grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

COUNT 10

On or about February 12, 2019, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER did knowingly and intentionally distribute fifty grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

COUNT 11

On or about April 18, 2019, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER, did knowingly and intentionally distribute fifty grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

COUNT 12

On or about September 5, 2019, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER, did knowingly and intentionally distribute five grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B).

//

//

COUNT 13

On or about October 24, 2019, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER, did knowingly and intentionally distribute fifty grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

COUNT 14

On or about October 29, 2019, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER, did knowingly and intentionally distribute fifty grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

COUNT 15

On or about October 29, 2019, within the District of Alaska, the defendant, CHRISTOPHER POINDEXTER, did knowingly and intentionally use and carry a firearm, to wit, a Glock 9mm semi-automatic pistol, during and in relation to the drug trafficking crime charged in Count 14.

All of which is in violation of 18 U.S.C. § 924(c)(1)(A)(i).

CRIMINAL FORFEITURE ALLEGATIONS

21 U.S.C. § 841 -- drug distribution - proceeds and facilitating property

1. The allegations contained in Counts 2-3, and 5-14 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. § 841, the defendants, CHRISTOPHER POINDEXTER and ROXANNE REED shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following: proceeds from the sale of drugs.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

18 U.S.C. § 924(d) - firearms and ammunition forfeiture

1. The allegations contained in Counts 1, 4, and 15 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 922(g)(1) set forth in Counts 1 and 4, and Section 924(c)(1)(A)(i) set forth in Count 15 of this Indictment, the defendants, ROXANNE REED and CHRISTOPHER POINDEXTER shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense.

//

//

//

//

//

//

//

//

//

//

//

//

//

//

//

//

//

All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Carole A. Holley for
STEPHAN A. COLLINS
Assistant U.S. Attorney
United States of America

s/ Bryan Schroder
BRYAN SCHRODER
United States Attorney
United States of America

DATE: February 20, 2020